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U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
FILED

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE - OPELOUSAS DIVISION**

APR 25 2000

ROBERT H. SHEMWELL CLERK  
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**JOEL A. MORVANT, SR., MONICA \* CIVIL ACTION NO. CV 99-1427 L-O  
MORVANT, JOEL A. MORVANT, JR. \*  
AND RIDGE M. MORVANT \***

VERSUS

\* JUDGE MELANCON

## L&L SANDBLASTING, INC. AND CXY ENERGY, INC.

\* \* MAGISTRATE METHVIN

## **ANSWER TO COMPLAINT OF INTERVENTION**

NOW INTO COURT, through undersigned counsel, comes L & L SANDBLASTING, INC., who in answer to the Complaint of Intervention of Louisiana Workers Compensation Corporation ("LWCC"), avers as follows:

## FIRST DEFENSE

The Complaint of Intervention fails to state a claim or cause of action against L & L Sandblasting, Inc. upon which relief may be granted.

## SECOND DEFENSE

Answering separately the allegations of the Complaint of Intervention, L & L Sandblasting, Inc. avers as follows:

L.

The allegations of paragraph 1 of the Complaint of Intervention do not require an answer of this defendant in that they merely reference the Complaint for Damages filed by the Complainant, a written document which is the best evidence of itself and which has

already been answered by L & L Sandblasting, Inc. However, out of an abundance of caution and should a response be deemed necessary, L & L Sandblasting, Inc. adopts as if copied *in extenso* all its prior answers, denials, and defenses previously pled in answer to the Complaint for Damages filed by the Complainant.

II.

The allegations of paragraph 2 of the Complaint of Intervention are denied for lack of information sufficient to justify a belief therein.

III.

The allegations of paragraph 3 of the Complaint of Intervention are denied for lack of information sufficient to justify a belief therein.

IV.

The allegations of paragraph 4 of the Complaint of Intervention are denied for lack of information sufficient to justify a belief therein.

V.

The allegations of paragraph 5 of the Complaint of Intervention contain conclusions of law and statements of legal principals and thus, no answer is required of this defendant. However, out of an abundance of caution and should response be deemed necessary, the allegations are denied.

VI.

The allegations of paragraph 6 of the Complaint of Intervention contain conclusions of law and statements of legal principals and thus, no answer is required of this defendant.

However, out of an abundance of caution and should response be deemed necessary, the allegations are denied.

VII.

The allegations of paragraph 7 of the Complaint of Intervention contain conclusions of law and statements of legal principals and thus, no answer is required of this defendant. However, out of an abundance of caution and should a response be deemed necessary, the allegations are denied.

WHEREFORE, premises considered, L & L SANDBLASTING, INC. prays that this Answer be deemed good and sufficient; that after the lapse of all legal delays and due proceedings had, there be a judgment herein in favor of L & L Sandblasting, Inc., dismissing LWCC's Complaint of Intervention, at LWCC's cost; for all orders and decrees necessary in the premises; and for all general and equitable relief.

Respectfully submitted,

VOORHIES & LABBÉ  
(A Professional Law Corporation)

BY:

  
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**ATTORNEYS FOR L & L SANDBLASTING,  
INC.**

**C E R T I F I C A T E**

**I HEREBY CERTIFY** that a copy of the above and foregoing has this day been forwarded to all known counsel of record by depositing same in the United States mail, postage prepaid and properly addressed.

Lafayette, Louisiana this 24<sup>th</sup> day of April, 2000.



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April 24, 2000

Honorable Robert H. Shemwell  
Clerk - United States District Court  
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Lafayette, LA 70501

RE: Joel A. Morvant, et al vs. L&L Sandblasting and CXY Energy, Inc.  
Civil Action Number: 99-1427  
Judge Melancon/Magistrate Methvin  
Our File Number: 00551-0585

Dear Sir:

Enclosed please find an original and one copy of an Answer to Complaint of Intervention which we request that you file into the record. We also request that you stamp "filed" the enclosed copy and return to our office. *I done gal*

With best wishes, I am

Very truly yours,



W. GERALD GAUDET  
JAMES P. DOHERTY, III  
WGG/JPD:kng/154795  
Enclosures

cc: Kenneth W. Jacques  
Thomas C. Williams